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May 9, 2025

BY ECF

Hon. John P. Cronan
United States District Judge
Southern District of New York
40 Foley Square
New York, New York 10007

**Re: United States v. Gregory Gumucio
23 Cr. 595 (JPC)**

Dear Judge Cronan:

I write to respectfully request that Gregory Gumucio's conditions of release be temporarily modified to allow him to travel to visit his daughter in Arizona from May 19 through May 22, 2025 and stay at an address to be provided to pretrial services. Pretrial services and the government do not object to this request.

At Mr. Gumucio's presentment on August 30, 2022, Magistrate Judge Jennifer E. Willis set the following bail conditions:

\$250,000 personal recognizance bond to be co-signed by two financially responsible persons and one individual with moral suasion (specifically, Mr. Gumucio's adult son); compliance with pretrial services supervision as directed; no airport travel (with specifics to be set by pretrial services); standalone location monitoring; no direct or indirect contact with any current or former employees of Yoga to the People identified by the government; no travel within 60 miles of the Canada border; surrender all travel documents with travel restricted to the Western District of Washington, the District of Oregon (solely for child's sports-related travel), and the Southern District of New York.

Over the last two and a half years, Mr. Gumucio has been granted a number of bail modifications easing his pretrial travel restrictions. *See, e.g.*, Doc. No. 52 (Jan. 26, 2023) (modifying conditions to permit travel to Portland, OR to seek employment); Doc. No. 68 (Mar. 20, 2023) (modifying conditions to permit travel to the Eastern District of Washington for daughter's sporting events); Doc. No. 79 (April 24, 2023) (modifying bail to permit travel within the Eastern District of Washington and the District of Oregon, with no travel within ten miles of an airport); Doc. No. 126 (Sept. 29, 2023) (modifying conditions to permit travel to Pullman, WA

and the District of Idaho, within ten miles of a small airport). Last summer, this Court granted a temporary modification of Mr. Gumucio's travel restrictions to enable him to relocate his family from Washington state to Colorado state. And in late 2024, the Court granted Mr. Gumucio's request to travel to Florida to visit his children's grandparents over the holidays.

On April 11, 2025, the Court granted Mr. Gumucio's request to remove the standalone GPS location monitoring condition of release, while maintaining all other current bail conditions.

In the two and a half years that Mr. Gumucio has been supervised by pretrial services, he has not incurred any violations whatsoever. This includes the past month of pretrial release, when he has been without location monitoring. Mr. Gumucio's former pretrial services officer in Washington has noted in the past that Mr. Gumucio "maintains contact with me regarding employment, travel, and the status of his case." His current pretrial officer in Colorado has said that Mr. Gumucio has had no issues complying with the conditions of his release.

Accordingly, Mr. Gumucio respectfully requests permission to travel to visit his daughter in Arizona from May 19 through May 22, 2025 and stay at an address to be provided to pretrial services. This would require Mr. Gumucio to provide a detailed travel itinerary to pretrial services in advance of his travel dates. Pretrial services and the government do not object to this request.

Respectfully submitted,

/s/

Marne L. Lenox, Esq.

Counsel for Gregory Gumucio

cc: Counsel of record

The request is granted. Mr. Gumucio's bail conditions are modified to permit him to travel to Arizona from May 19 through May 22, 2025, to visit his daughter, and to stay at an address to be provided to Pretrial Services, provided that Mr. Gumucio provides a detailed itinerary to Pretrial Services in advance of her travel dates.

SO ORDERED:

Dated: May 12, 2025



THE HONORABLE JOHN P. CRONAN
United States District Judge